

DELETE ACT AND IMPLEMENTING OPT-OUT REQUIREMENTS

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SESSION DESCRIPTION

The California Delete Act and growing state opt-out requirements are forcing organizations to rethink how they manage consumer opt-out and deletion requests at scale. We will discuss the practical compliance challenges of responding to universal opt-out signals, how (or whether) you are navigating the DROP platform, and compliance readiness for the August 1st deadline.

KEY DISCUSSION QUESTIONS

1. *DROP Readiness:* For those in scope, with the August 1 deadline approaching, how is your organization approaching DROP? For those in scope, are you relying on manual list downloads or building toward API integration, and which team owns the recurring 45-day cycle?
2. *Honoring DROP Requests:* Honoring a DROP request means matching hashed identifiers, deleting all associated data (including inferences), directing service providers and contractors to do the same, and keeping that data suppressed going forward. What are the most significant operational challenges (or opportunities): identity matching, suppression-list architecture, downstream propagation, or something else?
3. *Multiple Signals:* How are you reconciling various "do not sell/share" obligations, including the Global Privacy Control and other opt-out signals, with DROP deletion obligations?
4. *Enforcement:* Given CalPrivacy's active Data Broker Enforcement Strike Force and per-request, per-day penalties, how are you approaching documentation and audit-readiness?
5. *Looking ahead:* The Delete Act model is spreading (Connecticut has enacted a similar data broker registry and deletion mechanism). Are you building to California's standard and extending it nationally, or treating each state's opt-out/deletion regime separately? Which divergences concern you most?

PRE-READ DOCUMENTS (optional)

- *Delete Request and Opt-out Platform (DROP) — Information for Data Brokers* — California Privacy Protection Agency (privacy.ca.gov/data-brokers).
- *Third Time's the Charm: Connecticut Enacts Annual Privacy Update* — FPF (2026) (<https://fpf.org/blog/third-times-the-charm-connecticut-enacts-annual-privacy-update/>).

